

1 Kirsten A. Milton, Bar No. 14401
Daniel Aquino, Bar No. 12682
2 **JACKSON LEWIS P.C.**
300 South Fourth Street, Suite 900
3 Las Vegas, Nevada 89101
Tel: (702) 921-2460
4 Fax: (702) 921-2461

5 *Attorneys for Defendant*
Dignity Health

6 Lawrence J. Semenza, III, Bar No. 7174
7 Christopher D. Kircher, Bar No. 11176
Jarrod L. Rickard, Bar No. 10203
8 10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145

9 *Attorneys for Plaintiff*
10 *Megan Klatt, on behalf of herself*
and all others similarly situated

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 MEGAN KLATT, an individual, on behalf
14 of herself and all others similarly situated,

15 Plaintiff,

16 vs.

17 DIGNITY HEALTH, a California
corporation; DOES 1-50, unknown
18 individuals; and ROE COMPANIES 1-50,
unknown business entities,

19 Defendants.

Case No.: 2:17-cv-02425-RFB-BNW

**STIPULATION AND ORDER TO
CONTINUE SETTLEMENT
DOCUMENTS DEADLINE (Fifth Request)**

20 Plaintiff Megan Klatt (“Plaintiff”), by and through her attorneys of record, and Defendant
21 Dignity Health (“Defendant”) (collectively, the “Parties”), by and through its attorneys of record,
22 submit this Stipulation and Order to Continue Settlement Documents Deadline (Fifth Request)
23 (the “Stipulation”).

24 On February 28, 2019, the Parties participated in a mediation and subsequently reached a
25 settlement in principal. Therefore, on April 5, 2019, the Parties submitted a Stipulation and Order
26 to Suspend Dispositive Motion Deadlines Pending Settlement (“Stipulation to Suspend”),
27
28

1 requesting that the dispositive motion deadlines be suspended while the Parties worked diligently
2 to draft and agree upon the requisite settlement documents, ECF No. 86.

3 On April 10, 2019, the Court issued an Order granting the Stipulation to Suspend and
4 directed the Parties to file a stipulation to dismiss or dispositive motions by May 17, 2019, ECF
5 No. 87.

6 On May 16, 2019, the Parties filed a Stipulation and Order to Continue Settlement
7 Documents Deadline (First Request), ECF No. 89, which the Court granted on May 17, 2019,
8 ECF No. 93, because they needed additional time to complete the drafting of the settlement
9 documents given the complexity of the issues and length of documents, including a Joint Motion
10 for Preliminary Approval of Class Action Settlement and the associated Joint Stipulation of
11 Settlement, as well as various documents to be provided to the putative class members, which will
12 require Court approval.

13 On July 1, 2019, the Parties filed a Stipulation and Order to Continue Settlement
14 Documents Deadline (Second Request), ECF No. 95, which the Court granted on July 3, 2019,
15 ECF No. 96, because they needed additional time to complete the drafting of the settlement
16 documents. The settlement papers are currently due on July 10, 2019, ECF No. 96.

17 On July 19, 2019, the Parties filed a Stipulation and Order to Continue Settlement
18 Documents Deadline (Fourth Request), ECF No. 99, which the Court granted on July 22, 2019,
19 ECF No. 100, because they needed additional time to complete the drafting of the settlement
20 documents as Plaintiff's counsel was out of the office traveling. The settlement papers are
21 currently due on July 26, 2019, ECF No. 100.

1 Since the last extension was granted, the Parties have continued to work diligently to
2 finalize the settlement papers and are hopeful that they have agreement on all substantive issues.
3 However, they still also need to secure the signatures of the respective parties. As such, the
4 Parties request an additional seven (7) days, through and including August 2, 2019, to get the
5 documents executed and submit the papers for Court approval.

6 This Stipulation is submitted in good faith and not for the purpose of delay.

7
8 DATED: July 26th, 2019

SEMENZA KIRCHER RICKARD

9 /s/ Lawrence J. Semenza, III
10 Lawrence J. Semenza, III, Bar No. 7174
11 Christopher D. Kircher, Bar No. 11176
12 Jarrod L. Rickard, Bar No. 10203
13 10161 Park Run Drive, Suite 150
14 Las Vegas, NV 89145

*Attorneys for Plaintiff, on behalf of
herself and all others similarly situated*


15
16 DATED: July 26th, 2019

JACKSON LEWIS P.C.

17 /s/ Kirsten A. Milton
18 Kirsten A. Milton, Bar No. 14401
19 Daniel I. Aquino, Bar No. 12682
20 300 S. Fourth Street, Suite 900
21 Las Vegas, NV 89101

Attorneys for Defendant

22
23
24
25
26
27
28
IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE
DATED this 30th day of July 2019.